

1 Martha G. Bronitsky
Chapter 13 Standing Trustee
2 Po Box 5004
Hayward, CA 94540
3 (510) 266 - 5580

4 Trustee for Debtor(s)

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

7 In re

8 Ping Hong Liang

Chapter 13 Case No. 17-43090-WJL13

10 debtor(s)

**Trustee's Motion and Declaration to
Dismiss or Convert Proceedings for Case Deficiencies and Notice Thereon**

12 TO DEBTOR(S) AND DEBTOR(S)' ATTORNEY OF RECORD:

13
14 Martha G. Bronitsky, Chapter 13 Standing Trustee, hereby moves the court for an Order Dismissing
15 or converting this case for cause pursuant to 11 U.S.C. §1307(c) based on unreasonable delay that it is
16 prejudicial to creditors: Failure to file certification of pre-filing Consumer Credit Counseling and/or
17 Declaration of Exigent Circumstances re: pre-filing Credit Counseling; Balance of Schedules; Chapter 13
18 Plan and Chapter 13 Statement of Your Currently Monthly Income and Calculation of Commitment
19 Period.

20 The delay is unreasonable because the Debtor(s) is aware or should have been aware of these
21 requirements and the Trustee has previously requested these requirements be fulfilled.

22 Furthermore, the delay is prejudicial to creditors because disbursements cannot be made and
23 there is an automatic stay preventing collection efforts that would otherwise be available.

24 NOTICE IS HEREBY GIVEN that debtor or the attorney of record may request a hearing in
25 writing stating specific grounds for objecting to the dismissal or conversion of these proceedings to the
26 court and served on the trustee no later than twenty-one (21) days from the date of service of this motion.
27 Trustee will then schedule a hearing date and notice debtor and the attorney of record of said hearing
28 date.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury that the foregoing is true and correct.

Date: January 22, 2018

/s/ Martha G. Bronitsky

Signature of Martha G. Bronitsky
Chapter 13 Standing Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the within and foregoing document on the debtor (s), counsel for debtor (s), and if applicable, the creditor, creditor representatives and the registered agent for the creditor by depositing it in the United States mail with first class postage attached thereto.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Ping Hong Liang
2140 - 27Th Avenue
Oakland,CA 94601

Pro Per

(Counsel for Debtor)

(Debtor(s))

Date: 1/22/2018

/s/ Colleen Cazadamont

Colleen Cazadamont